

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA : Case No: 21 -CR-159 ABJ  
:  
:  
:  
18 U.S.C. § 875(c)  
:  
v.  
:  
CLEVELAND GROVER :  
MEREDITH, JR. :  
:  
Defendant. :  
:

FILED  
SEP 10 2021

Clerk, U.S. District & Bankruptcy  
Courts for the District of Columbia

STATEMENT OF OFFENSE

Pursuant to Federal Rule of Criminal Procedure 11, the United States of America, by and through its attorney, the United States Attorney for the District of Columbia, and the defendant, Cleveland Meredith, Jr., with the concurrence of his attorney, agree and stipulate to the below factual basis for the defendant's guilty plea—that is, if this case were to proceed to trial, the parties stipulate that the United States could prove the below facts beyond a reasonable doubt:

1. Defendant drove from Colorado to Washington D.C. and arrived in the evening of January 6, 2021 after the riots at the U.S. Capitol had ended. Defendant had planned to arrive in Washington D. C. January 5<sup>th</sup> and attend various rallies supporting former President Donald Trump.
2. On January 7, 2021, while Defendant was in a hotel in Washington, D.C., Defendant sent a text message threatening to injure. In a text message that Defendant sent in interstate commerce to one of his relatives who was then in Georgia, Defendant threatened that

he was, “[t]hinking about heading over to Pelosi C[\*\*]T’s speech and putting a bullet in her noggin on Live TV [purple devil emoji].”

3. Defendant’s relative, who viewed the text message as a threat, contacted Defendant’s mother, who then contacted the FBI as she was concerned for the safety of Defendant and others.

4. The FBI located Defendant in a hotel in Washington D.C. on January 7, 2021. Defendant agreed to interview with the FBI after being provided his *Miranda* rights, and voluntarily waiving them. He also gave consent to search his phone, and his truck, and trailer.

5. The FBI examined the contents of Defendant’s phone and found in it several text messages, which defendant admits that he sent in interstate commerce from January 4, 2021 to January 7, 2021 while in Colorado and Washington D.C. and in route to Washington, D.C. Defendant acknowledges that such messages were drafted and sent by him, and no additional person(s) had access to the device.

6. In Defendant’s trailer, which he had driven to Washington D.C. and was physically present at the hotel, the FBI found a Glock 19, nine-millimeter handgun, and a model IWI Tavor X95 rifle, approximately 2,500 rounds of ammunition, and 10 large capacity ammunition feeding devices.

7. Defendant acknowledges that when he sent the text message, which is the subject of Count I of the Indictment, he sent it with knowledge that the message would be viewed as a threat.

Respectfully submitted,

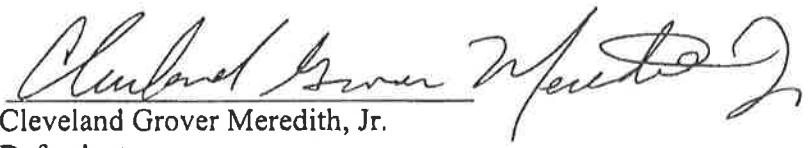
CHANNING D. PHILLIPS  
Acting United States Attorney  
D.C. Bar No. 415793

By: */s/ Anthony Franks*  
AUSA, Detailee  
Assistant United States Attorney

DEFENDANT'S ACKNOWLEDGMENT

I, Cleveland Grover Meredith, Jr., have read this Statement of the Offense and have discussed it with my attorney. I fully understand this Statement of the Offense. I agree and acknowledge by my signature that this Statement of the Offense is true and accurate. I do this voluntarily and of my own free will. No threats have been made to me nor am I under the influence of anything that could impede my ability to understand this Statement of the Offense fully.

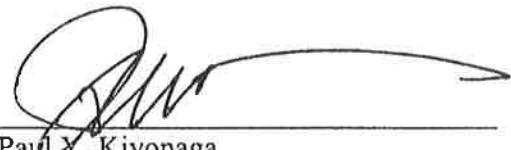
Date: 9/6/21

  
Cleveland Grover Meredith, Jr.  
Defendant

ATTORNEY'S ACKNOWLEDGMENT

I have read this Statement of the Offense and have reviewed it with my client fully. I concur in my client's desire to adopt this Statement of the Offense as true and accurate.

Date: 9/6/21

  
Paul Y. Kiyonaga  
Attorney for Defendant